

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-01163-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-01164-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-01165-ADA
	§	CIVIL ACTION 6:20-cv-01166-ADA
v.	§	CIVIL ACTION 6:20-cv-01167-ADA
	§	CIVIL ACTION 6:20-cv-01168-ADA
SALESFORCE.COM, INC.,	§	CIVIL ACTION 6:20-cv-01169-ADA
<i>Defendant.</i>	§	CIVIL ACTION 6:20-cv-01170-ADA
	§	CIVIL ACTION 6:20-cv-01171-ADA
	§	CIVIL ACTION 6:20-cv-01172-ADA

**DECLARATION OF SAM STAKE IN SUPPORT OF
SALESFORCE.COM, INC.'S CLAIM CONSTRUCTION BRIEF**

I, Sam Stake, declare as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein.

2. Attached hereto as Exhibit A is the Declaration of Dr. Douglas C. Schmidt in Support of Salesforce's Opening Claim Construction Brief, dated October 6, 2021.

A. The '819 patent

3. Attached hereto as Ex. 819-1 is a true and correct copy of U.S. Patent No. 8,335,819.

4. Attached hereto as Ex. 819-2 is a true and correct excerpt of Webster's New World Telecom Dictionary (2008) ("Scripting"), produced in this action as SFDC00019283 - SFDC00019285.

5. Attached hereto as Ex. 819-3 is a true and correct excerpt of Encyclopedia of Computer Science and Technology, Revised Edition (2009) ("Scripting Languages"), produced in this action as SFDC00019276 - SFDC00019279.

B. The '827 patent

6. Attached hereto as Ex. 827-1 is a true and correct copy of U.S. Patent No. 8,369,827.

7. Attached hereto as Ex. 827-2 is a true and correct excerpt of 3GPP TS 23.203 V9.3.0, produced in this action as SFDC00019289 - SFDC00019339.

8. Attached hereto as Ex. 827-3 is a true and correct copy of Chapter 10 of EPC and 4G Packet Networks: Driving Mobile Broadband Revolution (2d ed.) (2013), produced in this action as SFDC00020445 - SFDC00020455.

9. Attached hereto as Ex. 827-4 is a true and correct excerpt of 3GPP TS 29.212

V8.3.0, produced in this action as SFDC00020213 - SFDC00020238.

10. Attached hereto as Ex. 827-5 is a true and correct excerpt of 3GPP TS 23.002 V9.1.0, produced in this action as SFDC00020121 - SFDC00020163.

11. Attached hereto as Ex. 827-6 is a true and correct copy of Policy and Charging Rules Function (PCRF) in LTE EPC Core Technology by Mojtaba Houshmand, produced in this action as SFDC00020458 - SFDC00020484.

C. The '928 patent

12. Attached hereto as Ex. 928-1 is a true and correct copy of U.S. Patent No. 8,280,928 (the "'928 patent").

13. Attached hereto as Ex. 928-2 is a true and correct excerpt of Dictionary of Computer and Internet Terms (10th ed.) (2009) ("Directory"), produced in this action as SFDC00020111 - SFDC00020114.

14. Attached hereto as Ex. 928-3 is a true and correct excerpt of The Facts on File Dictionary of Computer Science, Revised Edition (2006) ("Directory"), produced in this action as SFDC00020115 - SFDC00020117.

15. Attached hereto as Ex. 928-4 is a true and correct excerpt of the November 23, 2011 Applicant Amendment in the File History of the '928 patent.

16. Attached hereto as Ex. 928-5 is a true and correct excerpt of the January 11, 2012 Final Rejection in the File History of the '928 patent.

17. Attached hereto as Ex. 928-6 is a true and correct excerpt of the March 14, 2012 Appeal Brief in the File History of the '928 patent.

D. The '493 patent

18. Attached hereto as Ex. 493-1 is a true and correct copy of U.S. Patent No.

9,088,493.

19. Attached hereto as Ex. 493-2 is a true and correct excerpt of A Dictionary of Computer Science (7th ed.) (2016) (“Login”), produced in this action as SFDC00019084 - SFDC00019086.

20. Attached hereto as Ex. 493-3 is a true and correct excerpt of Webster’s New World College Dictionary (5th ed.) (2014) (“Consistent”), produced in this action as SFDC00020500 - SFDC00020507.

21. Attached hereto as Ex. 493-4 is a true and correct excerpt of Collins English Dictionary (1st ed.) (2015) (“Consistent”), produced in this action as SFDC00020487 - SFDC00020489.

E. The ’411 patent

22. Attached hereto as Ex. 411-1 is a true and correct copy of U.S. Patent No. 8,209,411 (the “’411 patent”).

23. Attached hereto as Ex. 411-2 is a true and correct excerpt of The Digital Designer’s Jargon Buster (1st ed.) (2004) (“Gateway”), produced in this action as SFDC00019075 - SFDC00019077.

24. Attached hereto as Ex. 411-3 is a true and correct excerpt of Microsoft Computer Dictionary (5th ed.) (2002) (“Gateway”), produced in this action as SFDC00019078 - SFDC00019080.

25. Attached hereto as Ex. 411-4 is a true and correct except of the April 20, 2011 Office Action in the File History of ’411 patent.

26. Attached hereto as Ex. 411-5 is a true and correct July 20, 2011 Applicant Remarks in Response to Office Action in the File History of ’411 patent.

F. The '060 patent

27. Attached hereto as Ex. 060-1 is a true and correct copy of U.S. Patent No. 9,277,060 (the "'060 patent").

28. Attached hereto as Ex. 060-2 is a true and correct excerpt of Newton's Telecom Dictionary (2005) ("Event"), produced in this action as SFDC00019044 - SFDC00019046.

29. Attached hereto as Ex. 060-3 is a true and correct excerpt of Dictionary of Computing (5th ed.) (2004) ("Log"), produced in this action as SFDC00019041 - SFDC00019043.

30. Attached hereto as Ex. 060-4 is a true and correct excerpt of Dictionary of Computer Science (Revised Edition) (2006) ("Log"), produced in this action as SFDC00019034 - SFDC00019037.

31. Attached hereto as Ex. 060-5 is a true and correct excerpt of Wiley Electrical and Electronics Engineering Dictionary (2004) ("Log"), produced in this action as SFDC00019053 - SFDC00019055.

32. Attached hereto as Ex. 060-6 is a true and correct excerpt of the December 20, 2010 Amendment in Response to Final Office Action in the File History of the '060 patent.

G. The '731 patent

33. Attached hereto as Ex. 731-1 is a true and correct copy of U.S. Patent No. 7,551,731 (the "'731 patent").

34. Attached hereto as Ex. 731-2 is a true and correct excerpt of Hargrave's Comm'ns Dictionary (2001) ("Called Party," "Calling Party," "Caller ID (CLID)," and "Caller Device"), produced in this action as SFDC00019099 - SFDC00019102.

35. Attached hereto as Ex. 731-3 is a true and correct excerpt of Hargrave's Comm'ns Dictionary (2001) ("Terminal Equipment"), produced in this action as SFDC00019103 -

SFDC00019105.

36. Attached hereto as Ex. 731-4 is a true and correct excerpt of Newton's Telecom Dictionary (19th Ed.) (2003) ("Calling Party" and "Caller Name"), produced in this action as SFDC00019106 - SFDC00019108.

37. Attached hereto as Ex. 731-5 is a true and correct excerpt of the October 22, 2008 Final Rejection in the File History of the '731 patent.

38. Attached hereto as Ex. 731-6 is a true and correct excerpt of the December 12, 2008 Response to Office Action in the File History of the '731 patent.

39. Attached hereto as Ex. 731-7 is a true and correct excerpt of the January 22, 2009 Response to Final Office Action in the File History of the '731 patent.

40. Attached hereto as Ex. 731-8 is a true and correct excerpt of the February 11, 2009 Notice of Allowance in the File History of the '731 patent.

H. The '892 patent

41. Attached hereto as Ex. 892-1 is a true and correct copy of U.S. Patent No. 8,391,892 (the "'892 patent").

42. Attached hereto as Ex. 892-2 is a true and correct excerpt of the February 12, 2009 Applicant Arguments/Remarks Made in Amendment in the File History of the '892 patent.

I. The '320 patent

43. Attached hereto as Ex. 320-1 is a true and correct copy of U.S. Patent No. 9,336,320 (the "'320 patent").

44. Attached hereto as Ex. 320-2 is a true and correct excerpt of Dictionary of Computing (5th ed.) (2004) ("Ghost"), produced in this action as SFDC00019056 - SFDC00019058.

45. Attached hereto as Ex. 320-3 is a true and correct excerpt of Dictionary of Computing (6th ed.) (2010) (“Ghost”), produced in this action as SFDC00019059 - SFDC00019061.

46. Attached hereto as Ex. 320-4 is a true and correct excerpt of the February 19, 2010 Original Application in the File History of the ’320 patent.

47. Attached hereto as Ex. 320-5 is a true and correct excerpt of the January 14, 2013 Amendment in the File History of the ’320 patent.

48. Attached hereto as Ex. 320-6 is a true and correct excerpt of the January 25, 2013 Response to Office Action in the File History of the ’320 patent.

49. Attached hereto as Ex. 320-7 is a true and correct excerpt of the March 25, 2013 Response to Office Action in the File History of the ’320 patent.

50. Attached hereto as Ex. 320-8 is a true and correct excerpt of the June 11, 2013 Larson Appeal Brief in the File History of the ’320 patent.

51. Attached hereto as Ex. 320-9 is a true and correct excerpt of the October 28, 2015 Appeal Decision in the File History of the ’320 patent.

J. The ’899 patent

52. Attached hereto as Ex. 899-1 is a true and correct copy of U.S. Patent No. 8,923,899 (the “’899 patent”).

53. Attached hereto as Ex. 899-2 is a true and correct excerpt of Webster’s New World Telecom Dictionary (“SIP (Session Initiation Protocol)”), produced in this action as SFDC00020108 - SFDC00020110.

54. Attached hereto as Ex. 899-3 is a true and correct copy of RFC 3261 for SIP: Session Initiation Protocol, produced in this action as SFDC00019839 - SFDC00020107.

55. Attached hereto as Ex. 899-4 is a true and correct excerpt of the April 25, 2013 Response to Office Action in the File History of the '899 patent.

56. Attached hereto as Ex. 899-5 is a true and correct copy of Roy Thomas Fielding's Dissertation *Architectural Styles and the Design of Network-based Software Architectures* (2000), produced in this action as SFDC00019659 - SFDC00019838.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6, 2021.

/s/ Sam Stake
Sam Stake